

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

*Exhibit
to
Avenali*

JOSH L. ANDERSON

V.

CIVIL ACTION NO. 04-135 ERIE

KATIE L. AVENALI

PLAINTIFF'S FRIST SET OF INTERROGATORIES TO DEFENDANT

In accordance with RULE 33 of the FEDERAL RULES OF CIVIL PROCEDURE, plaintiff requests that defendant answer the following interrogatories under oath, and that the answers be signed by the persom making them and be served on plaintiff within 30 days of service of these interrogatories.

If you cannot answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

These interrogatories shall be deemed continuing, so as to require supplemental answer as new and different information materializes.

INTERROGATORIES TO DEFENDANT

- 1[] STATE THE NAME AND ADDRESS OR OTHERWISE IDENTIFY AND LOCATE ANY PERSON WHO, TO YOU OR YOUR ATTORNEY'S KNOWLEDGE, CLAIMS TO KNOW FACTS RELEVANT TO THE CONDUCT DESCRIBED IN THESE INTERROGATORIES.
- 2[] IDENTIFY AND ATTACH A COPY OF ANY AND ALL DOCUMENTS RELATING TO YOUR EDUCATION AND TRAINING.
- 3[] IDENTIFY AND ATTACH A COPY OF ANY AND ALL DOCUMENTS SHOWING WHO WAS ON DUTY IN CELL BLOCK A "MAX" AT 1230hrs. THE DAY OF FEB. 4, 2004.
- 4[] IDENTIFY AND ATTACH A COPY OF THE REPORT YOU FILED ON FEB. 4, 2004.
- 5[] HOW LONG HAVE YOU WORKED FOR THE WARREN COUNTY PRISON?
- 6[] HOW LONG HAVE YOU KNOWN THE PLAINTIFF JOSH L. ANDERSON?
- 7[] WHEN DID YOU AND THE PLAINTIFF JOSH L. ANDERSON START TO HAVE PROBLEMS?
- 8[] HAS THE PLAINTIFF JOSH L. ANDERSON EVER TRIED TO WORK OUT WHAT EVER WAS OR IS GOING ON BETWEEN YOU AND THE PLAINTIFF JOSH L. ANDERSON?
- 9[] WHY DO YOU THINK YOU AND THE PLAINTIFF JOSH L. ANDERSON ARE HAVING THESE PROBLEMS?
- 10[] DO YOU HAVE OR HAD ANY THOUGHTS ABOUT THE PLAINTIFF JOSH L. ANDERSON? [] POSITIVE OR NEGATIVE []

11[] WHAT DO YOU THINK OF THE PROBLEMS BETWEEN YOU AND THE PLAINTIFF JOSH L. ANDERSON?

12[] HAVE YOU EVER ASSAULTED THE PLAINTIFF JOSH L. ANDERSON BY KICKING HIM IN THE FACE?

13[] WHAT WERE YOUR ORDERS IN DEALING WITH THE PLAINTIFF JOSH L. ANDERSON?

14[] HAS THE PLAINTIFF EVER QUESTIONED YOU ABOUT STARING AT HIM?

15[] DO YOU KNOW THAT WHEN YOU STARE AT THE PLAINTIFF JOSH L. ANDERSON IT UPSETS HIM?

These interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes.

Date

JOSH L. ANDERSON
FW-6915
1 Kelley Dr.
Coal Township, PA. 17866